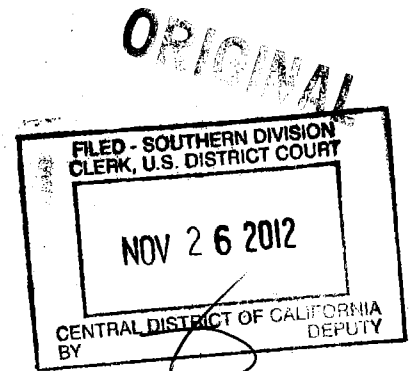


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KEATING DENTAL ARTS, INC.



9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION

13 JAMES R. GLIDEWELL DENTAL
14 CERAMICS, INC. dba GLIDEWELL
LABORATORIES,

15 Plaintiff,

16 v.

17 KEATING DENTAL ARTS, INC.

18 Defendant.

19 AND RELATED COUNTERCLAIMS.
20
21
22

Civil Action No.
SACV11-01309-DOC(ANx)

23 APPLICATION OF
24 DEFENDANT KEATING
25 DENTAL ARTS, INC. TO
26 FILE UNDER SEAL
27 EXHIBIT A TO THE
28 DECLARATION OF DIANE
MALLOS DONICH, THE
DECLARATION OF
ROBERT BRANDON, AND
THE STATEMENT OF
GENUINE DISPUTES OF
MATERIAL FACT IN
SUPPORT OF KEATING'S
OPPOSITIONS TO
GLIDEWELL'S MOTIONS
FOR SUMMARY
JUDGMENT

Date: December 17, 2012
Time: 8:30 a.m.
Crtrm: 9D

Honorable David O. Carter

2012 NOV 26 PM 3:29
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY

LOGGED

1 PLEASE TAKE NOTICE that, pursuant to L.R. 79-5.1, Defendant
 2 Keating Dental Arts, Inc. ("Keating") hereby seeks an Order of this Court
 3 permitting Keating to file under seal the following documents:

4 1. **Exhibit A to the Declaration of Diane Mallos Donich** in Support
 5 of Keating's Opposition To James R. Glidewell Dental Ceramics, Inc. d/b/a
 6 Glidewell Laboratories' ("Glidewell") Motion For Partial Summary Judgment
 7 Re Trademark Misuse, Unfair Competition, Unclean Hands, Fair Use, And
 8 Estoppel ("Exhibit A to Donich Declaration").

9 2. **Declaration of Robert Brandon** in Support of Keating's
 10 Oppositions to Glidewell's Motions for Partial Summary Judgment ("Brandon
 11 Declaration").

12 3. **Statement Of Genuine Disputes Of Material Fact** In Support Of
 13 Keating's Opposition To Glidewell's Motion For Partial Summary Judgment Re
 14 Infringement Of A Federally Registered Mark (First Cause Of Action) And
 15 Dismissal Of Defendant's Second Affirmative Defense And First Counterclaim
 16 ("Statement of Genuine Disputes").

- 17 • Exhibit A to the Donich Declaration is an internal business document
 18 containing non-public information on Keating Dental Arts' sales,
 19 which Keating has designated as "Attorneys' Eyes Only" pursuant to
 20 the Confidentiality Order.
- 21 • The Brandon Declaration contains non-public information about
 22 Keating Dental Arts' customers derived from Keating's internal
 23 business records and this information has been designated by Keating
 24 as "Attorneys' Eyes Only" pursuant to the Confidentiality Order.
- 25 • The Statement of Genuine Disputes contains excerpts from Keating
 26 Dental Arts' business records that have been designated by Keating as
 27 "Attorneys' Eyes Only" pursuant to the Confidentiality Order.

28 / / /

1 Accordingly, Keating respectfully requests that the Court permit the
2 above documents to be filed under seal.

3 Respectfully submitted,

4 KNOBBE, MARTENS, OLSON & BEAR, LLP

5
6 Dated: November 26, 2012

By: 

Lynda J. Zadra-Symes

Jeffrey L. Van Hoosear

David G. Jankowski

Attorneys for Plaintiff,

7
8
9 KEATING DENTAL ARTS, INC.

PROOF OF SERVICE

I am a citizen of the United States of America and I am employed in Irvine, California. I am over the age of 18 and not a party to the within action. My business address is 2040 Main Street, Fourteenth Floor, Irvine, California. I am readily familiar with the firm's business practices for the collection and processing of correspondence for mailing, and that mail so processed will be deposited the same day during the ordinary course of business.


On November 26, 2012, I caused the within APPLICATION OF DEFENDANT KEATING DENTAL ARTS, INC. TO FILE UNDER SEAL EXHIBIT A TO THE DECLARATION OF DIANE MALLOS DONICH, THE DECLARATION OF ROBERT BRANDON, AND STATEMENT OF GENUINE DISPUTES OF MATERIAL FACT IN SUPPORT OF KEATING'S OPPOSITIONS TO GLIDEWELL'S MOTIONS FOR SUMMARY JUDGMENT to be served on the parties or their counsel shown below, by placing it in a sealed envelope addressed as follows:

Via Electronic Mail and Federal Express:

Philip J. Graves
pgraves@swlaw.com
Snell & Wilmer LLP
350 S. Grand Ave., Suite 2600
Los Angeles, CA 90071

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 26, 2012 at Irvine, California.



Claire A. Stoneman

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